



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-5

J. Gordon Stephens, Jr., Treasurer  
Burson-Marsteller Political  
Action Committee  
1850 M Street, NW, Ste. 900  
Washington, DC 20036

MAR 3 1995

Identification Number: C00201863

Reference: Amended July Quarterly (4/1/94-6/30/94) dated  
12/19/94, Amended October Quarterly (7/1/94-9/30/94)  
dated 12/19/94, Amended 30 Day Post-General  
(10/20/94-11/28/94) dated 12/19/94 and Year End  
(11/29/94-12/31/94) Reports

Dear Mr. Stephens:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A supporting Line 11(a)(1) of your report discloses contributions received through what appears to be a payroll deduction plan. Please amend your report to disclose the amount deducted per pay period and frequency of deduction. 11 CFR §104.8(b) Please refer to the enclosed sample of properly reported payroll deductions.

Any amendment or clarification should be filed with the Federal Election Commission. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Neil Evans  
Reports Analyst  
Reports Analysis Division

## PAYROLL DEDUCTIONS

### SCHEDULE A

### ITEMIZED RECEIPTS

#### Contributions from Individuals

Any information copied from your Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for committee purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE OR PAC

National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code

Anne Sullivan  
811 15th Street  
City, State 222

Use separate columns for each category of the Donated Summary Page		PAGE	OR
		FOR LINE NUMBER 11(b)(3)	

Name of Donor	Date given	Year given	Amount of Con-
National Organization, Inc.	Payroll deduction	\$75.00	
Branch Manager	(Q12 itemized)		

B. Full Name, Mailing Address and ZIP Code

Bethany Jones  
821 15th Street  
City, State 222

Name of Donor	Date given	Year given	Amount of Con-
National Organization, Inc.	Payroll deduction	\$150.00	
Vice President	(Q30 itemized)		

Itemize payroll deductions only after they have exceeded \$200 per calendar year from an individual.

## Payroll Deductions

Once an individual's deductions aggregate over \$200 in a calendar year, report the total amount deducted from the donor's paychecks during the reporting period on Schedule A. In parentheses indicate the amount that was deducted each pay period. Instead of stating a specific date of receipt, write "payroll deduction" under "Date." The other itemized information, including the year-to-date total, must be completed for each donor. 104.8(b).

**EXAMPLE:** During an election year, a corporate manager authorizes her employer to deduct \$12 per pay period (each pay period is two weeks) for the company's SSF. The SSF, which files FEC reports on a quarterly schedule, includes the manager's contributions as "unitemized contributions" in its April and July quarterly reports. By June 30, the closing date for the July report, the manager's aggregate contributions are \$180 — still below the \$200 itemization threshold. By September 30 — the closing date for the October quarterly report — the manager's contributions reach \$228. Therefore, the committee itemizes the total contributions received from the manager during the third quarter (\$120), providing the year-to-date total in the appropriate space. (See Item A in the illustration above.)

## IN-KIND CONTRIBUTIONS

### SCHEDULE A

### ITEMIZED RECEIPTS

#### Contributions from Individuals

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NAME OF COMMITTEE OR PAC

National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code

Martin L. Evans  
4 River Road  
City, State 222

Use separate columns for each category of the Donated Summary Page		PAGE	OR
		FOR LINE NUMBER 11(b)(3)	

Name of Donor	Date given	Year given	Amount of Con-
National Organization, Inc.	6/19/89	\$5,000.00	
Chairwoman	(Q30 itemized)		

### SCHEDULE B

### ITEMIZED EXPENDITURES

#### Operating Expenditures/Other Federal

Any information copied from your Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for committee purposes, other than using the name and address of any political committee to solicit contributions. See Item A above.

NAME OF COMMITTEE OR PAC

National Organization PAC 000000001

A. Full Name, Mailing Address and ZIP Code

Martin L. Evans  
4 River Road  
City, State 222

Use separate columns for each category of the Donated Summary Page		PAGE	OR
		FOR LINE NUMBER 21(b)	

Name of Donor	Date given	Year given	Amount of Con-
Staffer, price	6/19/89	\$5,000.00	
Total amount	(Q30 itemized)		

Itemize in-kind contributions on both Schedules A and B so as not to inflate the cash-on-hand amount.

## In-Kind Contributions

When determining whether to itemize an in-kind contribution, follow the same guidelines listed above under "When to Itemize Receipts." See Chapter 2 for information on how to determine the dollar value of an in-kind contribution.

In addition, add the value of the in-kind contribution to the operating expenditures total on Line 21(b) (in order to avoid inflating the cash-on-hand amount). 104.13(a)(2).

If the in-kind contribution must be itemized on Schedule A, then it must also be itemized on a Schedule B for operating expenditures. See the illustration at right.

### Appreciated Goods

When a committee receives an in-kind contribution whose value may

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